

Message

From: Kappelman, David [Kappelman.David@epa.gov]
Sent: 9/18/2019 6:45:43 PM
To: Walker, Stuart [Walker.Stuart@epa.gov]; Anderson, RobinM [Anderson.RobinM@epa.gov]
Subject: RE: EPA consultation process on the use of RESRAD BUILD

I don't think the NAVY BRAC RPMs working on HPNS know enough "technically" to decide what to "hang their hat on". I know the Navy has technically sound CHPs and Nuclear Engineers, but none have "surfaced" since I have been involved on this site.

Anchors Away,
Dave

From: Walker, Stuart
Sent: Wednesday, September 18, 2019 2:15 PM
To: Kappelman, David <Kappelman.David@epa.gov>; Anderson, RobinM <Anderson.RobinM@epa.gov>
Subject: RE: EPA consultation process on the use of RESRAD BUILD

I don't think the Navy was arguing all of their contamination was more point than area, but maybe they will now. The last thing I remember them hanging their hat on was the dissipation rate, but then they came in with some rate based on using a remediation technology rather than normal household/office cleaning (e.g., vacuuming, mopping, etc.)

Stuart Walker
Superfund Remedial program National Radiation Expert
Science Policy Branch
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From: Kappelman, David <Kappelman.David@epa.gov>
Sent: Wednesday, September 18, 2019 1:41 PM
To: Walker, Stuart <Walker.Stuart@epa.gov>; Anderson, RobinM <Anderson.RobinM@epa.gov>
Subject: RE: EPA consultation process on the use of RESRAD BUILD

Stuart,
No additional building survey work has been conducted to my knowledge since the TetraTech data falsification was identified. Any work plan should include low enough minimum detection limits to identify BPRG clearance levels; however, it is anticipated that any contamination identified will be very "spotty" and not widespread as assumed in the BPRG. The Navy will not know how widespread any "lower" contamination concentrations (dpm/100cm²) are unless their minimum detection limits are low enough at the 95% confidence interval. The only Work Plan that the Navy has worked on so far that I have seen is the rework of Parcel G.

Several of the buildings, or what is left of the buildings, "may" be used for residential development in the future. The Navy cannot know for sure after the building/property is transferred to San Francisco for development.

Dave

From: Walker, Stuart
Sent: Wednesday, September 18, 2019 11:53 AM
To: Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Laija, Emerald

<Laija.Emerald@epa.gov>

Cc: Lowery, Brigid <Lowery.Brigid@epa.gov>; Healy, Helena <Healy.Helena@epa.gov>; Libelo, Laurence <Libelo.Laurence@epa.gov>; Ammon, Doug <Ammon.Doug@epa.gov>; Anderson, RobinM <Anderson.RobinM@epa.gov>; Poore, Christine <Poore.Christine@epa.gov>; Kappelman, David <Kappelman.David@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>

Subject: FW: EPA consultation process on the use of RESRAD BUILD

Fyi, risk assessment consultation looking likely for Hunters Point buildings.

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From: Praskins, Wayne <Praskins.Wayne@epa.gov>

Sent: Tuesday, September 17, 2019 4:46 PM

To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>

Cc: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>

Subject: RE: EPA consultation process on the use of RESRAD BUILD

Derek –

Thanks.

As a reminder, EPA's May 2014 guidance, "Radiation Risk Assessment At CERCLA Sites: Q & A," describes information typically needed to evaluate whether an alternative to the EPA PRG calculators, like RESRAD BUILD, is an appropriate tool for a CERCLA risk analysis. In the response to Question #16, the guidance identifies several key provisions:

"... a thorough understanding of both the PRG recommended model and any alternative model ..."

"... model runs using both the recommended EPA PRG model and the alternative model."

"... input parameters [in the alternative model] ... as close as possible to the PRG inputs ..."

"... specific supporting data and information in the administrative record."

Please consider these provisions as you assemble your package. We will keep FFRRO informed but the consultation will be with OSRTI.

Wayne Praskins | Superfund Project Manager
U.S. Environmental Protection Agency Region 9
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San Francisco, CA 94105
415-972-3181

From: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>

Sent: Tuesday, September 17, 2019 11:40 AM

To: Praskins, Wayne <Praskins.Wayne@epa.gov>

Cc: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>

Subject: RE: EPA consultation process on the use of RESRAD BUILD

Hi Wayne,

Thank you for the email.

The Navy is preparing a package to send you with our RESRAD BUILD calculations and inputs. Navy experts do not know why the Building PRG calculator is showing different values than RESRAD BUILD. We will request with our package that you begin the consultation process with FFRRO.

I look forward to continued discussions with you on the appropriate input parameters to use in RESRAD BUILD to evaluate our remedial goals.

Best Regards,

Derek J. Robinson, PE
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BRAC Environmental Coordinator
Navy BRAC PMO West
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From: Praskins, Wayne <Praskins.Wayne@epa.gov>
Sent: Tuesday, September 17, 2019 10:43 AM
To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Cc: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: [Non-DoD Source] EPA consultation process on the use of RESRAD BUILD

Derek –

I'm following up on yesterday's conversation to confirm that we have not yet started the formal EPA HQ consultation process on the use of RESRAD BUILD to evaluate the building remediation goals at HPNS. We appreciate the information you have submitted to date (including the description of RESRAD inputs and assumptions sent last Thursday, 9/12) and expect to start the consultation process as soon as we have a complete package that allows us to understand and hopefully gain confidence in the RESRAD results, including the reasons why the RESRAD results differ from results obtained with EPA's BPRG calculator.

Thanks.

Wayne Praskins | Superfund Project Manager
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